

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-60238-CR-GAYLES/STRAUSS

18 U.S.C. § 1349

18 U.S.C. § 1343

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

vs.

NOEL STRACHAN,
OMAR ETAYEM,
 a/k/a "Omar Rivera,"
ODAIN MARSH,
YEGISIBET BENLI,
 a/k/a "Lisa Benli,"
YUNIOR PEREZ MURO,
MICHAEL PARDOS,
 a/k/a "Mario Cruise,"
 a/k/a "Gangster Mike,"
ANTHONY JONAS,
JAVIER ARGUELLES,
 a/k/a "Cuba,"
MARLON FOSTER,
DEMAL CHEEKS, and
DERROL SCAFE,

 Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. A vehicle title established a person or business as the legal owner of a vehicle. If there were any lienholders to the vehicle, the vehicle title also listed all lienholders.

2. State of Florida tag agencies used the Florida Department of Highway Safety and Motor Vehicles (FLHSMV) database to issue vehicle titles.

3. When a vehicle title was issued, the FLHSMV database automatically connected with the National Motor Vehicle Title Information System (NMVTIS), the servers for which were located outside the State of Florida.

4. Under Florida law, a person claiming a lien for performing labor or services on a vehicle may enforce such lien by sale of the vehicle in accordance with the procedures set forth in section 713.585, Florida Statutes.

5. In general, there are four requirements to comply with the procedures set forth in section 713.585, Florida Statutes:

- a. The claimant (*i.e.*, the lienor) must check official records to locate all persons who may have an interest in the vehicle;
- b. The claimant must provide notice by certified mail, return receipt requested, of the lien and proposed sale to the registered owner of the vehicle, to the customer as indicated on the order for repair, and to all other persons claiming an interest in or lien thereon;
- c. The claimant must publish the notice in a newspaper circulated in the county where the vehicle is held; and
- d. Immediately upon the sale of the vehicle and payment in cash of the purchase price, the lienor shall file with the clerk of the circuit court in the county where the vehicle is held a verified report of the sale stating a description of the vehicle sold, including the vehicle identification number

(VIN); the name and address of the purchaser; the date of the sale; and the selling price.

6. Upon receipt of documents showing compliance with section 713.585, Florida Statutes, State of Florida tag agencies issued a vehicle title to the purchaser of a vehicle at a lien sale.

COUNT 1
Conspiracy to Commit Wire Fraud
(18 U.S.C. § 1349)

1. Paragraphs 1–6 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around March 2017, through in or around April 2019, in Broward, Miami-Dade, and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

**NOEL STRACHAN,
OMAR ETAYEM,
a/k/a “Omar Rivera,”
ODAIN MARSH,
YEGISIBET BENLI,
a/k/a “Lisa Benli,”
YUNIOR PEREZ MURO,
MICHAEL PARDOS,
a/k/a “Mario Cruise,”
a/k/a “Gangster Mike,”
ANTHONY JONAS,
JAVIER ARGUELLES,
a/k/a “Cuba,”
MARLON FOSTER,
DEMAL CHEEKS, and
DERROL SCAFE,**

did willfully, that is, with the intent to further the purpose of the conspiracy, and knowingly combine, conspire, and agree with each other and with others known and unknown to the Grand Jury, to knowingly and with the intent to defraud, devise, and intend to devise a scheme and artifice

to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that such pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE CONSPIRACY

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves and others by, among other things: (1) acquiring vehicles through various means, including by theft and deception; (2) preparing and submitting false and fraudulent title application documents to remove the vehicle's lawful owner(s) and lienholder(s) from the title; and (3) retaining possession of the vehicle for personal use and enjoyment or selling the vehicle for a profit, or both.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the purpose of this conspiracy included, among other things, the following:

4. **NOEL STRACHAN** and his co-conspirators acquired vehicles through various means. Some vehicles were stolen. Some vehicles were purchased by straw buyers. Some vehicles were rented using fraudulent means of identification and never returned. Some vehicles were purchased at a steeply discounted rate from distressed owners who financed the initial purchase of the vehicle.

5. **NOEL STRACHAN, OMAR ETAYEM**, and other co-conspirators altered and caused to be altered the VIN on some stolen vehicles.

6. **NOEL STRACHAN, OMAR ETAYEM**, and other co-conspirators altered and caused to be altered the mileage on some vehicles.

7. **NOEL STRACHAN, ODAIN MARSH, YEGISIBET BENLI, YUNIOR PEREZ MURO**, and other co-conspirators entered and caused to be entered some VINs into the FLHSMV database to determine if the vehicles were reported as stolen or otherwise had an alert that would prevent a title transfer from occurring.

8. **NOEL STRACHAN, YEGISIBET BENLI**, and other co-conspirators prepared and caused to be prepared false and fraudulent title application documents. These documents purported to establish compliance with Florida's mechanics lien enforcement process (codified at section 713.585, Florida Statutes) by falsely and fraudulently representing, among other things, that: (a) labor or services were performed on a vehicle; (b) the registered owner of the vehicle failed to pay for the labor or services; (c) a notice of a claim of lien was served on all persons or entities claiming an interest in the vehicle or lien on the vehicle; and (d) the vehicle was sold to the title applicant at a public sale.

9. **YEGISIBET BENLI** was the office manager at a company in Broward County, Florida that provided courier services to register and title vehicles in Florida.

10. **NOEL STRACHAN, OMAR ETAYEM, ODAIN MARSH, MICHAEL PARDOS, ANTHONY JONAS, JAVIER ARGUELLES, MARLON FOSTER, DEMAL CHEEKS, DERROL SCAFE**, and other co-conspirators submitted and caused to be submitted applications for vehicle titles to **YEGISIBET BENLI**, knowing that the title application documents were false and fraudulent.

11. **YUNIOR PEREZ MURO** was a title clerk at a State of Florida tag agency located in Miami-Dade County, Florida. **YUNIOR PEREZ MURO** was authorized to process vehicle title applications and issue vehicle titles in the State of Florida.

12. **YEGISIBET BENLI** delivered and caused the delivery of the false and fraudulent title application documents to **YUNIOR PEREZ MURO** for processing.

13. **YUNIOR PEREZ MURO** issued titles to vehicles, knowing that the title application documents were false and fraudulent, and often incomplete or erroneous under Florida law. These fraudulently obtained vehicle titles removed all prior owners and lienholders from the title or, if the vehicle was stolen, created a new title with a fraudulent VIN for the stolen vehicle.

14. After a fraudulently obtained vehicle title was issued, **NOEL STRACHAN, OMAR ETAYEM, ODAIN MARSH, MICHAEL PARDOS, ANTHONY JONAS, JAVIER ARGUELLES, MARLON FOSTER, DEMAL CHEEKS, DERROL SCAFE**, and other co-conspirators retained possession of the vehicles for personal use, sold the vehicles for a profit, or both.

15. In some instances, after a fraudulently obtained vehicle title was issued, **NOEL STRACHAN, MICHAEL PARDOS, ANTHONY JONAS, MARLON FOSTER**, and other co-conspirators also applied for a loan, using the fraudulently obtained vehicle title as collateral.

16. From in or around March 2017, through in or around April 2019, the defendants fraudulently obtained titles to over 100 vehicles.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2–11
Wire Fraud
(18 U.S.C. § 1343)

1. Paragraphs 1–6 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around March 2017, through in or around April 2019, in Broward, Miami-Dade, and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants, as specified below, did knowingly, and with the intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice, did knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of wire communication, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE SCHEME AND ARTIFICE

3. It was the purpose of the scheme and artifice for the defendants and their accomplices to unlawfully enrich themselves and others by, among other things: (1) acquiring vehicles through various means, including by theft and deception; (2) preparing and submitting false and fraudulent title application documents to remove the vehicle's lawful owner(s) and lienholder(s) from the title; and (3) retaining possession of the vehicle for personal use and enjoyment, selling the vehicle for a profit, or both.

MANNER AND MEANS OF THE SCHEME AND ARTIFICE

4. Paragraphs 4–16 of the Manner and Means Section of Count 1 of this Indictment are re-alleged and incorporated fully herein by reference as a description of the manner and means

by which the defendants and their co-conspirators sought to accomplish the purpose of the scheme and artifice.

USE OF THE WIRES

5. On or about the dates specified as to each count below, the defendants, as specified in each count below, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, did knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of wire communication, certain writings, signs, signals, pictures, and sounds, as more particularly described in each count below:

Count	Approx. Date	Defendant(s)	Description of Wire
2	November 6, 2017	NOEL STRACHAN, MARLON FOSTER, and MICHAEL PARDOS	Title issued for 2016 Cadillac CTS-V (VIN *196165) in Miami-Dade County, Florida, utilizing NMVTIS servers located outside the State of Florida.
3	April 24, 2018	NOEL STRACHAN and DERROL SCAFE	Title issued for 2013 Mercedes SL550 (VIN *018543) in Miami-Dade County, Florida, utilizing NMVTIS servers located outside the State of Florida.
4	July 12, 2018	NOEL STRACHAN and ANTHONY JONAS	Title issued for 2013 Mercedes SL550 (VIN *028543) in Miami-Dade County, Florida, utilizing NMVTIS servers located outside the State of Florida.
5	August 29, 2018	NOEL STRACHAN and MARLON FOSTER	Title issued for 2005 Honda Accord (VIN *104606) in Miami-Dade County, Florida,

			utilizing NMVTIS servers located outside the State of Florida.
6	October 19, 2018	NOEL STRACHAN and ODAIN MARSH	Title issued for 2016 Challenger (VIN *193526) in Miami-Dade County, Florida, utilizing NMVTIS servers located outside the State of Florida.
7	October 24, 2018	NOEL STRACHAN, OMAR ETAYEM, and DERROL SCAFE	Title issued for 2015 BMW i8, (VIN *391648) in Miami-Dade County, Florida, utilizing NMVTIS servers located outside the State of Florida.
8	October 31, 2018	NOEL STRACHAN, YEGISIBET BENLI, and JAVIER ARGUELLES	Title issued for 2015 Polaris Slingshot (VIN *108843) in Miami-Dade County, Florida, utilizing NMVTIS servers located outside the State of Florida.
9	November 27, 2018	NOEL STRACHAN, YEGISIBET BENLI, and JAVIER ARGUELLES	Title issued for 2016 Polaris Slingshot (VIN *107405) in Miami-Dade County, Florida, utilizing NMVTIS servers located outside the State of Florida.
10	December 10, 2018	NOEL STRACHAN and DEMAL CHEEKS	Title issued for 2012 Cadillac Escalade (VIN *235060) in Miami-Dade County, Florida, utilizing NMVTIS servers located outside the State of Florida.
11	January 3, 2019	NOEL STRACHAN and MICHAEL PARDOS	Title issued for 2017 Mercedes GLE AMG (VIN *059653) in Miami-Dade County, Florida, utilizing NMVTIS servers located outside the State of Florida.

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS 12–15
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

On or about the dates specified below, in Broward, Miami-Dade, and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants, as specified below, during and in relation to a felony violation of Title 18, United States Code, Section 1349, that is, Conspiracy to Commit Wire Fraud, as charged in Count 1, did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person, as specified in each count below:

Count	Approx. Date	Defendant(s)	Means of Identification
12	November 16, 2017	MICHAEL PARDOS	Name, date of birth, and driver's license number of M.C.
13	October 31, 2018	NOEL STRACHAN	Name and forged signature of S.G.
14	October 31, 2018	NOEL STRACHAN	Name and commission number of D.R.
15	November 27, 2018	NOEL STRACHAN and OMAR ETAYEM	Name, date of birth, and driver's license number of G.L.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which any of the defendants, **NOEL STRACHAN, OMAR ETAYEM, a/k/a “Omar Rivera,” ODAIN MARSH, YEGISIBET BENLI, a/k/a “Lisa Benli,” YUNIOR PEREZ MURO, MICHAEL PARDOS, a/k/a “Mario Cruise,” a/k/a “Gangster Mike,” ANTHONY**

JONAS, JAVIER ARGUELLES, a/k/a "Cuba," MARLON FOSTER, DEMAL CHEEKS, and DERROL SCAFE, have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Sections 1343 and/or 1349, as alleged in this Indictment, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON


JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY


LAURENCE M. BARDFELD
ASSISTANT UNITED STATES ATTORNEY


ADAM M. HAPNER
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: _____

v.

NOEL STRACHAN, et al.,
_____/**Defendants.****Court Division** (select one)

- ☐ Miami ☐ Key West ☐ FTP
☒ FTL ☐ WPB

Superseding Case Information:

New Defendant(s) (Yes or No) _____
 Number of New Defendants _____
 Total number of New Counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect: _____
4. This case will take 10 days for the parties to try.
5. Please check appropriate category and type of offense listed below:
 (Check only one) (Check only one)
 I ☐ 0 to 5 days ☐ Petty
 II ☒ 6 to 10 days ☐ Minor
 III ☐ 11 to 20 days ☐ Misdemeanor
 IV ☐ 21 to 60 days ☒ Felony
 V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) No
If yes, Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) Yes

By: _____

ADAM M. HAPNER

Assistant United States Attorney

FL Bar No. 112006

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: NOEL STRACHAN

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Counts #: 2–11

Wire Fraud

18 U.S.C. § 1343

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Counts #: 13–15

Aggravated Identity Theft

18 U.S.C. § 1028A(a)(1)

- * **Max. Term of Imprisonment:** 2 years, consecutive to any other sentence
- * **Mandatory Min. Term of Imprisonment (if applicable):**
2 years, consecutive to any other sentence
- * **Max. Supervised Release:** 1 year
- * **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: OMAR ETAYEM a/k/a "Omar Rivera"

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Count #: 7

Wire Fraud

18 U.S.C. § 1343

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Count #: 15

Aggravated Identity Theft

18 U.S.C. § 1028A(a)(1)

- * **Max. Term of Imprisonment:** 2 years, consecutive to any other sentence
- * **Mandatory Min. Term of Imprisonment (if applicable):**
2 years, consecutive to any other sentence
- * **Max. Supervised Release:** 1 year
- * **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ODAIN MARSH

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

* **Max. Term of Imprisonment:** 20 years

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$250,000

Count #: 6

Wire Fraud

18 U.S.C. § 1343

* **Max. Term of Imprisonment:** 20 years

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: YEGISIBET BENLI a/k/a "Lisa Benli"

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Count #: 8 & 9

Wire Fraud

18 U.S.C. § 1343

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: YUNIOR PEREZ MURO

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

*** Max. Term of Imprisonment:** 20 years

*** Mandatory Min. Term of Imprisonment (if applicable):** N/A

*** Max. Supervised Release:** 3 years

*** Max. Fine:** \$250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MICHAEL PARDOS a/k/a "Mario Cruise" and "Gangster Mike"

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Counts #: 2 & 11

Wire Fraud

18 U.S.C. § 1343

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Count #: 12

Aggravated Identity Theft

18 U.S.C. § 1028A(a)(1)

- * **Max. Term of Imprisonment:** 2 years, consecutive to any other sentence
- * **Mandatory Min. Term of Imprisonment (if applicable):**
2 years, consecutive to any other sentence
- * **Max. Supervised Release:** 1 year
- * **Max. Fine:** \$250,000

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ANTHONY JONAS

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

* **Max. Term of Imprisonment:** 20 years

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$250,000

Count #: 4

Wire Fraud

18 U.S.C. § 1343

* **Max. Term of Imprisonment:** 20 years

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JAVIER ARGUELLES a/k/a "Cuba"

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

*** Max. Term of Imprisonment:** 20 years

*** Mandatory Min. Term of Imprisonment (if applicable):** N/A

*** Max. Supervised Release:** 3 years

*** Max. Fine:** \$250,000

Counts #: 8–9

Wire Fraud

18 U.S.C. § 1343

*** Max. Term of Imprisonment:** 20 years

*** Mandatory Min. Term of Imprisonment (if applicable):** N/A

*** Max. Supervised Release:** 3 years

*** Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MARLON FOSTER

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

* **Max. Term of Imprisonment:** 20 years

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$250,000

Counts #: 2 & 5

Wire Fraud

18 U.S.C. § 1343

* **Max. Term of Imprisonment:** 20 years

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: DEMAL CHEEKS

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Count #: 10

Wire Fraud

18 U.S.C. § 1343

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: DERROL SCAFE

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1349

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Count #: 3 & 7

Wire Fraud

18 U.S.C. § 1343

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000